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MAY 17 1999

FCC MAIL ROOM

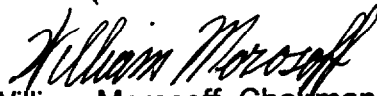
May 11, 1999

Magalie Roman Salas  
Office of the Secretary, TW-A306  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Ms. Salas:

Enclosed are our comments (with attachments) to NPRM, MM Docket No. 99-25.  
The required 3.5 inch diskette is being forwarded to Mr. Paul Gordon under  
separate cover.

Sincerely

  
William Morosoff, Chairman  
Voice of Vashon Group

Enclosures: Original and 4 copies

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## **The Voice of Vashon**

**Comments to NPRM  
MM Docket 99-25**

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### **NEED**

When the word "Community" is used, Vashon-Maury Island comes instantly to mind. By the nature of its geography and socio-economic character, the Island can truly be categorized as "its own place". Near in distance to the major urban areas of the south Puget Sound in Washington state, Island life continues to escape from the vortex of big city life. One need only to look and listen to the proximate urban newspapers and broadcast media to become starkly aware that Vashon-Maury Island is a community under-served and under-represented. We are, accordingly, a prime candidate for "community-oriented" radio broadcasting and strongly support the proposed LPFM service described in MM Docket No. 99-25.

*Note: See attached Map and "Statement of Need".*

### **COMMERCIAL VS NON-COMMERCIAL**

Like other closely-knit and relatively isolated communities, commercial activities are integral to life on Vashon-Maury Island. Indeed, "commerce" and "community" are inseparable. Almost all businesses on the Island are locally owned and operated. Competing with mainland giants of commerce, as well as with the growing internet commerce, is a never-ending chore for Island businesses. The opportunity to further advertise their wares and services, at reasonable costs, will enhance their ability to foster community cohesiveness, while at the same time provide a predictable revenue stream to an Island LPFM station. We, therefore, support commercial stations.

*Note: See attached "Mission Statement".*

### **TECHNICAL**

As our need is for an LP1000 capability, we support the Skinner Petition, specifically as regards a 100 meters (328 ft) "HAAT". This technical capability is particularly important to our Island as we are approximately 13 miles long, with a need to "reach" an additional mile at either end for coverage of the ferry docks on the mainland.

*Note: See attached map.*

## **OWNERSHIP AND ELIGIBILITY**

The over-riding rationale for an LPFM service is to give a voice to communities/constituencies currently voiceless. Though "economies of scale" and "broadcast experience" have merit, we believe that these considerations are irrelevant to the proposed LPFM concept, whose purpose is not to make a profit or operate "efficiently". In fact, the LPFM concept should encourage "amateurs" who will operate in the public good. We conclude then, that ownership and operational control should be local only, and further that the owner of one (1) LPFM station should be prohibited from owning any other radio or TV station in the country.

## **APPLICATIONS AND AWARDS**

We consider that, notwithstanding our support for commercial activity, auctioning to the "highest bidder" defeats the basic thrust of giving voice to the currently voiceless. What would prevent an applicant from "buying" an LPFM license in order to mute (or weaken) its voice, so as to minimize its impact on the "highest bidders" other interests? Accordingly, we support any approach to licensing which best serves the "public interest" (where "the public" is the community/constituency served).



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